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February 16, 2004

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for Benzene Sulfonic Acid

Dear Administrator Leavitt:

The following comments on the Aromatic Sulfonic Acids Association (ASAA) test plan for the chemical benzene sulfonic acid (BSA) are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

ASAA submitted its test plan on September 16, 2003, for BSA (CAS # 98-11-3), a catalyst used in the hardening or curing of polymeric resins. Using a structurally related chemical, p-tolulenesulphonic acid (TSA, CAS # 104-15-4), and ECOSAR and other calculations, they have eliminated the need for further ecotoxicity testing.

However, neither chemical apparently had any available information on other SIDS hazard endpoints, and ASAA has proposed an OECD 422 to address the reproductive, developmental and repeated dose endpoints, which would kill 675 animals. Given that both chemicals are sulphonic acids, we do not believe further testing is warranted at this time. The chemicals are, to quote the test plan, "very acidic and therefore expected to show local effects in the gastrointestinal tract." Chemicals that are classified as irritants, especially those as severe as sulphonic acids, will not likely cause systemic toxicity at doses which do not also cause significant local GI effects. Thus, the interpretation of any systemic effects that may be observed will be confounded by local effects due to the irritancy of the compound. Additionally, the irritancy potential is such that testing would result in extreme suffering for the animals involved. Other public commenters have pointed out at other times that chemicals such as these should not be subject to further testing. We submit that this is one instance where the entire knowledge of a chemical should be used to determine further planned testing, instead of checking the box for each endpoint. Rational toxicological decisions are warranted in this case.

Thank you for your attention to these comments. We can be reached at 202-686-2210, ext. 335 or by email at *kstoick@pcrm.org*.

Sincerely,

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Research Analyst

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